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NTT America, Inc.
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February 24, 2012

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed, please find the 2011 Customer Proprietary Network Information Certificate ("CPNI") which NTT America, Inc., pursuant to 47 C.F.R. §64.2009(e), hereby submits.

Copies of the certification and statement are being delivered today as follows:

| | |
|------------------------------------|------------|
| FCC Secretary | One Copy |
| FCC Enforcement Bureau | Two Copies |
| Best Publishing and Printing, Inc. | One Copy |

If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully Submitted,

NTT America, Inc.

By: 
Alex Morel

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 29, 2012

Name of company(s) covered by this certification: NTT America, Inc.

Form 499 Filer ID: 826583

Name of signatory: Doug Junkins

Title of signatory: Chief Technology Officer

I, Doug Junkins, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____



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NTT America, Inc.

Statement on CPNI Compliance

NTT America provides exclusively to its customers information services and/or “telecommunications”, but not “telecommunications service”, as those terms are defined in sections 3(20), 3(43) and 3(46), respectively, of the Communications Act. Therefore, NTT America is not a “telecommunications carrier”, as that term is defined in section 3(44) of the Act. The certification requirement in section 64.2009(e) of the Commission’s Rules applies by its terms exclusively to a “telecommunications carrier.” Because NTT America is not a “telecommunications carrier”, section 64.2009(e) does not apply to its operations.

For the additional information of the Commission, NTT America, which serves only large enterprises, does not use any information that would be considered to be CPNI if NTT America provided “telecommunications services” except in the provision or marketing of services among the category of service to which a customer already subscribes. NTT America does not disclose or permit the use of any such information by any agents, affiliates or third parties to market its services. However, NTT America may, pursuant to the express affirmative consent of the customer as set forth in a customer contract, provide services jointly with affiliates or a third party. NTT America personnel are trained to protect the confidential information of its customers. Customer information is provided only to designated customer personnel by designated account representatives. Network security and liaison with law enforcement are governed by a confidential network security agreement entered into between NTT America, NTT Verio Inc, and their parent corporation, NTT Communications Corporation, on the one hand, and the Department of Justice, the Department of Homeland Security and the Department of the Treasury, on the other.